

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: ) Case No. 18bk24763  
ROSEBUD FARM, INC. ) Chapter 7  
Debtor. ) Honorable Timothy A. Barnes

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FINDINGS OF FACT AND CONCLUSIONS OF LAW IN SUPPORT OF ORDER  
AWARDING TO LAUREN NEWMAN AND THOMPSON COBURN LLP, COUNSEL FOR  
CHAPTER 7 TRUSTEE, FOR ALLOWANCE AND PAYMENT OF FIRST INTERIM  
COMPENSATION AND REIMBURSEMENT OF EXPENSES

TOTAL FEES REQUESTED:	\$ 126,460.00	TOTAL COSTS REQUESTED:	\$ 636.50
TOTAL FEES REDUCED:	\$ 4,658.75	TOTAL COSTS REDUCED:	\$ 0.00
TOTAL FEES ALLOWED:	\$ 121,801.25	TOTAL COSTS ALLOWED:	\$ 636.50

TOTAL FEES AND COSTS ALLOWED: \$ 122,437.75

The attached time and expense entries have been highlighted to reflect disallowance in whole or in part. The basis for each disallowance is reflected by numerical notations that appear on the left of each highlighted entry. The numerical notations correspond to the enumerated paragraphs below.

(1) Improper Allocation of Professional Resources – TOTAL of disallowed amounts \$ 3,110.50

The Court denies the allowance in part of compensation for the indicated task(s) as a professional with a lower level of skill and experience or a paraprofessional could have performed the task(s). *In re Pettibone*, 74 B.R. 293, 303 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (“Senior partner rates will be paid only for work that warrants the attention of a senior partner. A senior partner who spends time reviewing documents or doing research a beginning associate could do will be paid at a rate of a beginning associate. [Citation omitted]. Similarly, non-legal work performed by a lawyer which could have been performed by less costly non-legal employees should command a lesser rate.”); *In re Wildman*, 72 B.R. 700, 710 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (same); *In re Alberto*, 121 B.R. 531, 535 (Bankr. N.D. Ill. 1990) (Squires, J.) (determining use of partner appropriate where attendant complex legal issues warrant highly experienced practitioner).

In this case, the entries reduced under this category have been allowed at the associate rate for research assignments that could have been delegated to an associate.

(2) Unreasonable Time – TOTAL of disallowed amounts: \$ 892.00

The Court denies the allowance in part of compensation for the indicated task(s) since the professional or paraprofessional expended an unreasonable amount of time on the task(s) in light of the nature of the task(s), the experience and knowledge of the professional performing the task(s),

and the amount of time previously expended by the professional or another on the task(s). *In re Pettibone*, 74 B.R. 293, 306 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) ("The Court will determine what is the reasonable amount of time an attorney should have to spend on a given project... An attorney should not be rewarded for inefficiency. Similarly, attorneys will not be fully compensated for spending an unreasonable number of hours on activities of little benefit to the estate."); *In re Wildman*, 72 B.R. 700, 713 (Bankr. N.D. Ill. 1987) (Schmetterer, J.) (same).

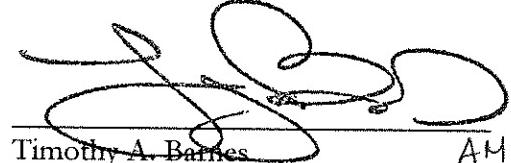
In this case, any time charged for attending hearings where the matter has been granted in chambers will not be tolerated.

Additionally, the court cautions counsel that the time entries for hearings in general were almost an hour beyond the hearing time. Counsel cannot bill for commute time to the court and such entries will be strictly scrutinized going forward.

- (3) Unreasonable Travel Rate – TOTAL of disallowed amounts (50% of affected entries):  
\$ 656.25

The Court denies the allowance in part of compensation for travel time or entries that are lumped with travel time, where compensation at the normal hourly rate (not the customary one-half discounted rate) is sought without explanation. *In re Planter*, Case No. 08 B 16883, 2009 WL 1393691 (Bankr. N.D. Ill. May 18, 2009) (Barbosa, J.) ("this Court has routinely held that time spent traveling to and from a location typically shall be compensated at one-half of the attorneys' or other professionals' hourly rate."); *In re McKeeman*, 236 B.R. 667 (B.A.P. 8th Cir.1999); *In re Spanjer Bros., Inc.*, 191 B.R. 738, 755 (Bankr. N.D. Ill. 1996) (Squires, J.).

Dated: August 21, 2019



Timothy A. Barnes  
United States Bankruptcy Judge

# EXHIBIT A

FEES

Case Administration:

Date	Attorney/ Paralegal	Description	Hours	Amount	
09/20/18	Newman, Lauren	Prepare for conference call with trustee by reviewing bankruptcy court docket	0.20 \$525.00	\$105.00	
09/28/18	Newman, Lauren	Communications to and from A. Moglia, trustee, re equipment sales by debtor	0.20 \$525.00	\$105.00	
10/01/18	Newman, Lauren	Review and analyze debtor's schedules and statement of financial affairs	1.20 \$525.00	\$630.00	
Improper location	10/01/18	Pantoga, Ann Addis	Online search of recorder of deeds records to determine status of encumbrances against the real estate	0.30 \$435.00	\$130.50
	10/01/18	Newman, Lauren	Review and analyze the district court docket and pleadings in discrimination case against debtor, the opinion of the seventh circuit ruling against the debtor and the judgment against the debtor	1.50 \$525.00	\$787.50
	10/01/18	Boutcher, Karin A.	Request Illinois and Cook County, Illinois lien searches against Rosebud Farm, Inc.	0.30 \$215.00	\$64.50
	10/01/18	Newman, Lauren	Communication to B. Walsh, Chicago Title, to order lien search on debtor's real estate	0.20 \$525.00	\$105.00
	10/01/18	Newman, Lauren	Review liens from recorder of deeds re liens on debtor's real estate	0.20 \$525.00	\$105.00
	10/01/18	Newman, Lauren	Communication to A. Moglia, trustee, to send copies of liens from recorder of deeds re liens on debtor's real estate and advise on same	0.20 \$525.00	\$105.00
	10/01/18	Newman, Lauren	Direct ordering of UCC lien searches on debtor	0.20 \$525.00	\$105.00
	10/03/18	Newman, Lauren	Review title report on debtor's real property	0.30 \$525.00	\$157.50
	10/03/18	Newman, Lauren	Communication A. Moglia with title report on debtor's real property	0.20 \$525.00	\$105.00
	10/03/18	Newman, Lauren	Communication to J. Longo, counsel for judgment creditor, for introduction and to advise against additional liens against debtor's property	0.20 \$525.00	\$105.00
	10/04/18	Boutcher, Karin A.	Receive and review lien search results and forward same to L. Newman	0.30 \$215.00	\$64.50
	10/05/18	Newman, Lauren	Detailed communication to J. Longo, counsel for judgment creditor, to respond to questions on lease and other matters	0.30 \$525.00	\$157.50
	10/08/18	Newman, Lauren	Communication to A. Moglia, trustee, with results of UCC and judgment lien searches for debtor	0.20 \$525.00	\$105.00

Date	Attorney/ Paralegal	Description	Hours	Amount	
10/08/18	Newman, Lauren	Review and analyze results of UCC and judgment lien searches for debtor	0.50 \$525.00	\$262.50	
10/17/18	Newman, Lauren	Review district court docket, citation pleadings and court orders for citations to discover assets, in order to ascertain post-petition liens by judgment creditor	0.80 \$525.00	\$420.00	
10/17/18	Newman, Lauren	Detailed communication to A. Moglia, trustee, to advise on status of citation liens filed by judgment creditor and whether assets remain in estate	0.40 \$525.00	\$210.00	
) Improper location	10/17/18	Newman, Lauren	Legal research re validity of citation liens on debtor's assets, including Quade decision	1.80 \$525.00	\$945.00
	10/19/18	Newman, Lauren	Communications to and from A. Moglia, trustee, to plan strategy re possible lease rejection	0.20 \$525.00	\$105.00
	10/23/18	Newman, Lauren	Review schedules and prepare questions for upcoming continued 341 meeting of creditors	1.20 \$525.00	\$630.00
	10/23/18	Buckley Jr., Francis X.	Review schedules and SOFA in preparation for investigation of asset disposition by principals	0.80 \$620.00	\$496.00
	10/24/18	Buckley Jr., Francis X.	Meeting with D. Brown, attorney for debtor, re background of debtor's disposition of assets	0.80 \$620.00	\$496.00
	10/24/18	Newman, Lauren	Communication to J. Longo, counsel to R. Smith, judgment creditor, to advise that automatic stay prevents any further perfection of liens and trustee will move for contempt if he files liens post-petition	0.20 \$525.00	\$105.00
	10/24/18	Newman, Lauren	Communication to J. Longo, counsel to R. Smith, judgment creditor, to advise that automatic stay prevents appeal of his fee award in district court litigation	0.20 \$525.00	\$105.00
	10/24/18	Newman, Lauren	Communication to J. Longo, counsel to R. Smith, re cost considerations of extensive litigation against Debtor	0.20 \$525.00	\$105.00
	10/24/18	Newman, Lauren	Communication to J. Longo, counsel to R. Smith, re debtor's pre-petition liquidation of its assets	0.20 \$525.00	\$105.00
	10/24/18	Newman, Lauren	Review motion to lift stay by R. Collum, personal injury claimant, to pursue insurance policy	0.20 \$525.00	\$105.00
10/24/18	Newman, Lauren	Review outcome of creditors meeting and analyze possible asset recovery	0.70 \$525.00	\$367.50	
10/24/18	Newman, Lauren	Appear at continued meeting of creditors along with the trustee, and assist trustee in questioning the representative of the debtor	2.20 \$525.00	\$1,155.00	

Date	Attorney/ Paralegal	Description	Hours	Amount
10/29/18	Newman, Lauren	Communication to D. Brown re receipt of copy of lease on Debtor's premises	0.10 \$525.00	\$52.50
10/31/18	Newman, Lauren	Correspondence from M. Teich, counsel to R. Cullom, personal injury claimant, to advise Trustee has no objection to relief from stay against insurance proceeds only	0.20 \$525.00	\$105.00
10/31/18	Newman, Lauren	Draft notice of appearance by L. Newman, on behalf of A. Moglia, trustee	0.30 \$525.00	\$157.50
11/06/18	Newman, Lauren	Review amendment to lease and communicate to A. Moglia, trustee, re termination date for lease	0.20 \$525.00	\$105.00
11/07/18	Newman, Lauren	Communication to J. Gallo, Moglia Advisors, to send copy of lease and amendment to lease	0.20 \$525.00	\$105.00
11/07/18	Newman, Lauren	Telephone call with A. Moglia, trustee, re J. Gallo's role in case and to plan strategy	0.20 \$525.00	\$105.00
11/07/18	Newman, Lauren	Telephone call with J. Gallo, , to advise on value of property, pre-petition sales of assets and other issues in case	1.00 \$525.00	\$525.00
11/07/18	Newman, Lauren	Review communications and documents from debtor to plan strategy	1.20 \$525.00	\$630.00
11/07/18	Newman, Lauren	Communication to A. Moglia, trustee, re J. Gallo's role in case	0.20 \$525.00	\$105.00
11/07/18	Newman, Lauren	Draft memorandum to A. Moglia, trustee, and J. Gallo, with points and issues in Rosebud case, and to plan for upcoming conference call	2.50 \$525.00	\$1,312.50
11/08/18	Newman, Lauren	Review comparables to prepare for conference call with trustee	0.30 \$525.00	\$157.50
11/09/18	Newman, Lauren	Legal research timing of trustee's right to assume or reject leases when debtor is lessor, including issues under 365(h)	1.80 \$525.00	\$945.00
11/09/18	Newman, Lauren	Telephone conference with A. Moglia, trustee, to plan strategy re recovery of assets, sale of property, review pre-petition actions by debtor and other matters	1.30 \$525.00	\$682.50
11/12/18	Newman, Lauren	Communication to J. Longo, counsel for judgment creditor, to recommend filing an appearance in bankruptcy case to get pleadings and notices	0.20 \$525.00	\$105.00
11/12/18	Newman, Lauren	Review and analyze debtor's recently filed amended schedules	0.20 \$525.00	\$105.00
11/12/18	Newman, Lauren	Detailed communication and legal memorandum to A. Moglia, trustee, re assumption and rejection of lease where debtor is lessor	0.40 \$525.00	\$210.00

) Improper location

Date	Attorney/ Paralegal	Description	Hours	Amount
) Improper location	11/12/18 Newman, Lauren	Review results of research on assumption and rejection of lease where debtor is lessor	0.50 \$525.00	\$262.50
	11/15/18 Newman, Lauren	Draft motion for 2004 exam on Providence Bank & Trust	1.50 \$525.00	\$787.50
	11/15/18 Newman, Lauren	Communications to and from A. Moglia, trustee, and J. Gallo, re proof of sales by debtor	0.20 \$525.00	\$105.00
	11/16/18 Newman, Lauren	Continue to draft motion for 2004 exam on Providence Bank and draft subpoena for documents	1.50 \$525.00	\$787.50
	11/19/18 Newman, Lauren	Communication to A. Moglia, trustee, with draft of motion for 2004 exam on Providence Bank	0.20 \$525.00	\$105.00
	11/19/18 Newman, Lauren	Detailed memorandum to J. Gallo at Moglia Advisors re timeline of litigation against the debtor	0.40 \$525.00	\$210.00
	11/20/18 Newman, Lauren	Communication to D. Brown, counsel for debtor, to request all documents concerning pre-petition sales of equipment, trucks and trailers by debtor, including appraisals	0.30 \$525.00	\$157.50
	11/20/18 Newman, Lauren	Communications to and from A. Moglia, trustee, re filing 2004 motion and motion to employ	0.20 \$525.00	\$105.00
	11/26/18 Newman, Lauren	Communications with D. Brown, counsel for Debtor, re no receipts for equipment sales	0.10 \$525.00	\$52.50
	11/26/18 Newman, Lauren	Communication to A. Moglia, trustee, and J. Gallo, re counsel for debtor confirming no documentation of equipment sales	0.20 \$525.00	\$105.00
) Unreasonable tn was granted chambers d not called	11/26/18 Newman, Lauren	Communication to J. Gallo, Moglia Advisors, re upcoming motion for 2004 exam on Providence Bank	0.20 \$525.00	\$105.00
	11/27/18 Newman, Lauren	Review and analyze correspondence from another personal injury claimant against the debtor	0.20 \$525.00	\$105.00
	11/28/18 Newman, Lauren	Appear in court for motion for 2004 examination on Providence Bank	0.80 \$525.00	\$420.00
	11/28/18 Newman, Lauren	Communication to A. Moglia, trustee, to send copy of order granting motion for 2004 exam on Providence Bank	0.20 \$525.00	\$105.00
	11/28/18 Newman, Lauren	Communications to and from J. Gallo at Moglia Advisors re 2004 exam on Providence Bank	0.20 \$525.00	\$105.00
	11/28/18 Newman, Lauren	Draft motion for extension of time to assume or reject real property lease, prepare	3.20 \$525.00	\$1,680.00

Date	Attorney/ Paralegal	Description	Hours	Amount
		proposed order and prepare motion for extension of time for filing		
11/29/18	Newman, Lauren	Telephone call with A. Moglia and J. Gallo to plan strategy re sale of real estate, plan for fraudulent transfer analysis, and to review other issues in the case	0.70 \$525.00	\$367.50
11/29/18	O'Keefe, Julie L.	Transmit to and communicate with special process server re subpoena for rule 2004 examination to Providence Bank & Trust	0.40 \$255.00	\$102.00
11/29/18	Newman, Lauren	Detailed communication to D. Nemerov, personal injury counsel, to advise of automatic stay and to take no further action against debtor	0.30 \$525.00	\$157.50
11/29/18	Newman, Lauren	Communications to and from A. Moglia to schedule a conference call to plan next steps	0.20 \$525.00	\$105.00
12/03/18	Newman, Lauren	Communication to C. Conner, Providence Bank, to send copy of order authorizing 2004 exam on the Bank and to call with questions	0.20 \$525.00	\$105.00
12/03/18	Newman, Lauren	Telephone call with C. Conner, Providence Bank, re compliance with discovery for trustee on the Bank	0.20 \$525.00	\$105.00
12/04/18	Newman, Lauren	Communication to A. Moglia re continued hearing on motion to retain Moglia Advisors and to extend deadline to assume or reject lease	0.10 \$525.00	\$52.50
12/04/18	Newman, Lauren	Communication to A. Moglia, trustee, to advise debtor is requesting direction on preparation of tax return	0.20 \$525.00	\$105.00
12/04/18	Newman, Lauren	Communication to J. Gallo re subpoena response from Providence Bank	0.20 \$525.00	\$105.00
12/04/18	Newman, Lauren	Communications to and from D. Brown, counsel for debtor, re preparing and filing 2018 taxes	0.10 \$525.00	\$52.50
12/05/18	Newman, Lauren	Review successful service of subpoena on Providence Bank	0.10 \$525.00	\$52.50
12/11/18	Newman, Lauren	Review multiple communications from C. Conner with debtor's bank account documents, and forward same to J. Gallo at Moglia Advisors	0.40 \$525.00	\$210.00
12/11/18	Newman, Lauren	Telephone call with C. Conner, Providence Bank, re compliance with trustee's subpoena for documents on debtor's accounts	0.30 \$525.00	\$157.50
12/13/18	Newman, Lauren	Multiple communications to J. Gallo, at Moglia Advisors, from Providence Bank with documents for the 2004 production	0.40 \$525.00	\$210.00

Date	Attorney/ Paralegal	Description	Hours	Amount
12/14/18	Newman, Lauren	Communications to and from C. Conner at Providence Bank re production of documents	0.20 \$525.00	\$105.00
12/14/18	Newman, Lauren	Multiple communications to J. Gallo, Moglia Advisors, with production of documents from Providence Bank	0.30 \$525.00	\$157.50
12/19/18	Newman, Lauren	Communication to A. Moglia, trustee, to advise on outcome of court hearing and next court date	0.20 \$525.00	\$105.00
12/20/18	Newman, Lauren	Multiple communications to J. Gallo, Moglia Advisors, with documents from Providence Bank with deposit statements from debtor's accounts	0.30 \$525.00	\$157.50
12/20/18	Newman, Lauren	Review multiple emails from Providence Bank with deposit statements from debtor's accounts	0.30 \$525.00	\$157.50
12/21/18	Newman, Lauren	Review multiple communications from Providence Bank with documents for debtor's accounts	0.30 \$525.00	\$157.50
12/21/18	Newman, Lauren	Multiple communications to J. Gallo, Moglia Advisors, with documents from Providence Bank	0.20 \$525.00	\$105.00
12/21/18	Newman, Lauren	Communications to and from R. Nelson, real estate broker, re updates on marketing the property and preparing marketing summary for J. Longo	0.20 \$525.00	\$105.00
12/21/18	Newman, Lauren	Communication to J. Longo, judgment creditor, to advise real estate has been listed with broker	0.20 \$525.00	\$105.00
12/27/18	Newman, Lauren	Communication to C. Conner from Providence Bank confirming additional documents	0.10 \$525.00	\$52.50
01/02/19	Newman, Lauren	Review and forward multiple communications with documents from Providence Bank re Debtor's bank accounts to J. Gallo, Moglia Advisors	0.50 \$555.00	\$277.50
01/02/19	Newman, Lauren	Multiple communications with additional documents from Providence Bank re debtor's bank accounts to J. Gallo, Moglia Advisors	0.50 \$555.00	\$277.50
01/02/19	Newman, Lauren	Communications to and from J. Gallo, Moglia Advisors, re timing of payments to debtor	0.20 \$555.00	\$111.00
01/02/19	Newman, Lauren	Communication to A. Moglia, trustee, with re invoices for sale of trailers by debtor	0.10 \$555.00	\$55.50
01/02/19	Newman, Lauren	Communication to and from J. Brown, counsel for debtor, re invoices for sale of trailers	0.10 \$555.00	\$55.50

Date	Attorney/ Paralegal	Description	Hours	Amount
01/07/19	Newman, Lauren	Multiple communications to J. Gallo, Moglia Advisors, with documents from debtor's bank accounts at Providence Bank	0.30 \$555.00	\$166.50
01/11/19	Newman, Lauren	Multiple communications to J. Gallo, Moglia Advisors, to send documents from Providence Bank with debtor's bank account information	0.40 \$555.00	\$222.00
01/25/19	Newman, Lauren	Communications to and from J. Gallo, Moglia Advisors, re retaining accounts to file tax returns on behalf of Debtor	0.20 \$555.00	\$111.00
01/28/19	Newman, Lauren	Multiple communications with documents from Providence Bank to J. Gallo, Moglia Advisors, for review and analysis	0.40 \$555.00	\$222.00
01/31/19	Newman, Lauren	Communications to and from A. Moglia, trustee, re second personal injury claimant and contact from defense counsel	0.20 \$555.00	\$111.00
02/05/19	Newman, Lauren	Communication to A. Moglia, trustee, to advise J. Longo filed a proof of claim	0.10 \$555.00	\$55.50
02/06/19	Newman, Lauren	Communication to A. Kazaz, counsel for insurance company defending Rosebud Farm in personal injury case re notice to tenant of pending litigation	0.20 \$555.00	\$111.00
02/06/19	Newman, Lauren	Telephone call with A. Kazaz, counsel for insurance company defending Rosebud Farm in personal injury case re maintaining the premises	0.20 \$555.00	\$111.00
02/20/19	Newman, Lauren	Communication to A. Moglia, trustee, re hiring accountants to file debtor's tax returns	0.10 \$555.00	\$55.50
02/27/19	Newman, Lauren	Communications to and from A. Moglia, trustee, re communicating directly with R. Smith, secured creditor	0.20 \$555.00	\$111.00
03/08/19	Newman, Lauren	Communication to J. Longo, re locating and communicating with R. Smith, secured creditor	0.10 \$555.00	\$55.50
03/08/19	Newman, Lauren	Communications to and from A. Moglia, trustee, re locating and communicating with R. Smith, secured creditor	0.20 \$555.00	\$111.00
03/28/19	Newman, Lauren	Communication to A. Moglia, trustee, to advise on upcoming deadline for motion to assume or reject lease	0.20 \$555.00	\$111.00
03/28/19	Newman, Lauren	Draft motion to extend deadline for motion to assume or reject lease, prepare draft order and prepare for filing	2.50 \$555.00	\$1,387.50
03/28/19	Newman, Lauren	Communication to A. Moglia, trustee, with copy of court filed motion to extend deadline	0.20 \$555.00	\$111.00

Date	Attorney/ Paralegal	Description	Hours	Amount
		for motion to assume or reject lease, and to advise of court date		
04/04/19	Newman, Lauren	Review and analyze notice from insurance company re proxy request for shareholder vote	0.20 \$555.00	\$111.00
04/04/19	Newman, Lauren	Communication to D. Brown, counsel for debtor, re notice from insurance company re proxy request and to turn over shareholder information	0.20 \$555.00	\$111.00
04/05/19	Newman, Lauren	Communications to and from D. Brown, counsel for debtor, re shares in insurance company	0.20 \$555.00	\$111.00
04/05/19	Newman, Lauren	Communication to A. Moglia, trustee, re debtor's shares in insurance company	0.20 \$555.00	\$111.00
4/16/19	Newman, Lauren	Appear in court for trustee's motion to extend time to accept or reject lease with Kingdom Farms	1.30 \$555.00	\$721.50
4/18/19	Newman, Lauren	Communication to A. Moglia, trustee, with copy of order extending deadline to assume or reject lease with Kingdom Farms	0.20 \$555.00	\$111.00
		<b>Total Charges</b>	<b>51.90</b>	<b>\$27,354.50</b>

## **EXHIBIT B**

## Retention:

Date	Attorney/ Paralegal	Description	Hours	Amount	
09/24/18	Newman, Lauren	Draft motion to employ L. Newman and Thompson Coburn as counsel, draft affidavit in support of motion and draft proposed order employing L. Newman, F. Buckley and Thompson Coburn, LLP as counsel for Trustee	2.20 \$525.00	\$1,155.00	
09/25/18	Newman, Lauren	Communication to A. Moglia, trustee, preparing retention motion and clearing conflicts	0.20 \$525.00	\$105.00	
09/28/18	Newman, Lauren	Arrange for filing motion to employ L. Newman and Thompson Coburn as counsel	0.10 \$525.00	\$52.50	
09/28/18	Newman, Lauren	Communication to A. Moglia, trustee, to send draft of motion to employ L. Newman and Thompson Coburn as counsel	0.20 \$525.00	\$105.00	
09/28/18	Newman, Lauren	Communications to and from A. Moglia, trustee, re scheduling on motion to employ Thompson Coburn as counsel for trustee	0.20 \$525.00	\$105.00	
09/28/18	Newman, Lauren	Revise and finalize motion to authorize trustee to employ L. Newman and Thompson Coburn as counsel for Trustee	0.20 \$525.00	\$105.00	
Unreasonable denial was granted in chambers and not called	10/10/18	Newman, Lauren	Appear in court for motion authorize trustee to employ L. Newman and Thompson Coburn as counsel for trustee	0.90 \$525.00	\$472.50
	10/10/18	Newman, Lauren	Communication to A. Moglia, trustee, with order granting motion to authorize trustee to employ L. Newman and Thompson Coburn as counsel for trustee	0.20 \$525.00	\$105.00
	10/12/18	Newman, Lauren	Communication to R. Nelson, real estate broker, to request information on Foresite Realty for application to employ real estate broker	0.20 \$525.00	\$105.00
	10/15/18	Newman, Lauren	Communication to R. Nelson, real estate broker, to request professional credentials for employment application	0.20 \$525.00	\$105.00
	10/16/18	Newman, Lauren	Telephone conference with A. Moglia, trustee, re retaining a broker and sight visit to debtor's property to inspect premises	0.30 \$525.00	\$157.50
	10/16/18	Newman, Lauren	Communication to A. Moglia, trustee, re timing of motion to employ R. Nelson as broker	0.20 \$525.00	\$105.00
	10/16/18	Newman, Lauren	Communications to and from R. Nelson, real estate broker, re preparing the exclusive rights listing agreement with the trustee	0.20 \$525.00	\$105.00

Date	Attorney/ Paralegal	Description	Hours	Amount
10/16/18	Newman, Lauren	Draft motion to authorize employment by trustee to hire R. Nelson as real estate broker and Foresite Realty, and draft affidavit of disinterestedness	2.50 \$525.00	\$1,312.50
10/22/18	Newman, Lauren	Begin to review and revise real estate broker's exclusive right listing agreement	0.70 \$525.00	\$367.50
10/23/18	Newman, Lauren	Continue to proof read and revise exclusive rights broker's listing agreement to comply with bankruptcy procedure and create a redlined version	0.50 \$525.00	\$262.50
10/23/18	Newman, Lauren	Communication to R. Nelson, real estate broker, with affidavit of disinterestedness, for motion to employ broker	0.20 \$525.00	\$105.00
10/23/18	Newman, Lauren	Draft motion to authorize employment of R. Nelson, real estate broker, draft affidavit in support of motion and prepare draft order	1.70 \$525.00	\$892.50
10/23/18	Newman, Lauren	Communication to R. Nelson, real estate broker, to confirm agreed upon commission	0.20 \$525.00	\$105.00
10/23/18	Newman, Lauren	Communication A. Moglia, trustee, with draft of motion to employ real estate broker for his review	0.20 \$525.00	\$105.00
10/23/18	Newman, Lauren	Communication A. Moglia, trustee, re amount of commission for real estate broker	0.10 \$525.00	\$52.50
10/23/18	Newman, Lauren	Detailed communication to R. Nelson, real estate broker, with draft of exclusive rights broker's listing agreement, along with redlined version, and explanation of proposed changes	0.30 \$525.00	\$157.50
10/25/18	Newman, Lauren	Review and revise motion to employ real estate broker, revise proposed order, organize exhibits and prepare for filing	1.50 \$525.00	\$787.50
10/29/18	Newman, Lauren	Communication to R. Nelson, broker, to send copy of court-filed motion to retain real estate broker	0.20 \$525.00	\$105.00
11/01/18	Newman, Lauren	Communication to J. Longo, counsel to R. Smith, judgment creditor, to respond to inquiry on motion to employ real estate broker	0.20 \$525.00	\$105.00
11/06/18	Newman, Lauren	Communication to A. Moglia, trustee, to advise on outcome of motion for authority to employ R. Nelson and Foresite Realty as broker	0.20 \$525.00	\$105.00
11/06/18	Newman, Lauren	Appear in court for Trustee's motion for authority to employ R. Nelson and Foresite	1.60 \$525.00	\$840.00

Date	Attorney/ Paralegal	Description	Hours	Amount
		Realty as broker and on Cullom's motion for relief from automatic stay re insurance policy		
11/13/18	Newman, Lauren	Communication to A. Moglia, trustee, re preparing retention motion for Moglia Advisors	0.20 \$525.00	\$105.00
11/19/18	Newman, Lauren	Communication to A. Moglia to request hourly rates of Moglia Advisors	0.10 \$525.00	\$52.50
11/19/18	Newman, Lauren	Draft affidavit in support of motion to employ Moglia Advisors	0.50 \$525.00	\$262.50
11/19/18	Newman, Lauren	Draft motion to employ Moglia Advisors as consultants to the Trustee, and draft proposed order	2.30 \$525.00	\$1,207.50
11/26/18	Newman, Lauren	Proof read and revise motion to employ Moglia Advisors as financial consultants to the trustee	0.70 \$525.00	\$367.50
11/26/18	Newman, Lauren	Review and revise affidavit in support of retention motion for Moglia Advisors	0.40 \$525.00	\$210.00
11/26/18	Newman, Lauren	Communication to A. Moglia, trustee, with revised affidavit in support of retention of Moglia Advisors, for signature	0.20 \$525.00	\$105.00
11/27/18	Newman, Lauren	Prepare motion of trustee to employ Moglia Advisors for filing	0.40 \$525.00	\$210.00
11/28/18	Newman, Lauren	Communication to A. Moglia, trustee, to send a court filed copy of application to employ Moglia Advisors	0.20 \$525.00	\$105.00
12/12/18	Newman, Lauren	Communication to A. Moglia, trustee, with draft of motion to employ Heath Industrial, auctioneer, for his review	0.10 \$525.00	\$52.50
12/12/18	Newman, Lauren	Communications to and from S. Stabiner at Heath Industrial, re reviewing and executing the affidavit of disinterestedness	0.20 \$525.00	\$105.00
12/12/18	Newman, Lauren	Communication to A. Moglia, trustee, to advise the court granted his motion to authorize employment of Moglia Advisors and motion to extend deadline to assume or reject debtor's lease	0.20 \$525.00	\$105.00
12/12/18	Newman, Lauren	Appear in court for Trustee's motion to authorize employment of Moglia Advisors and motion to extend deadline to assume or reject debtor's lease	1.30 \$525.00	\$682.50
12/12/18	Newman, Lauren	Draft motion to employ Heath Industrial as auctioneer, draft proposed order, and affidavit of disinterestedness	3.20 \$525.00	\$1,680.00

Date	Attorney/ Paralegal	Description	Hours	Amount
12/20/18	Newman, Lauren	Proof read and finalize motion to retain Heath Advisors as auctioneer, and arrange for filing with court	0.30 \$525.00	\$157.50
01/03/19	Newman, Lauren	Communications with A. Moglia, trustee, re retaining auctioneer even though one offer includes purchase of debt's equipment	0.10 \$555.00	\$55.50
01/09/19	Newman, Lauren	Communication to S. Staber of Heath Industrial and A. Moglia, trustee, to advise court granted motion for trustee to retain Heath as auctioneer of debtor's personal property business assets	0.20 \$555.00	\$111.00
01/09/19	Newman, Lauren	Appear in court for motion to retain Heath Industrial as auctioneer of debtor's business assets	1.20 \$555.00	\$666.00
		<b>Total Charges</b>	<b>27.20</b>	<b>\$14,325.00</b>

## **EXHIBIT C**

**Sale of Property:**

Date	Attorney/ Paralegal	Description	Hours	Amount
09/20/18	Newman, Lauren	Telephone call with A. Moglia, trustee, to plan strategy re possible sale of building	0.20 \$525.00	\$105.00
10/12/18	Newman, Lauren	Communications to and from A. Moglia, trustee, to schedule a conference call to discuss sale of the debtor's real estate	0.10 \$525.00	\$52.50
10/12/18	Newman, Lauren	Review and analyze offer to purchase Debtor's real estate, and comparables sales from trustee	0.40 \$525.00	\$210.00
10/12/18	Newman, Lauren	Communications to and from A. Moglia, trustee, to comment on offer to purchase from tenant and amount of existing judgment	0.20 \$525.00	\$105.00
10/15/18	Newman, Lauren	Communication to A. Moglia, trustee, and R. Nelson, real estate broker, to advise that the Debtor had the 130th Street property appraised back in 2015	0.20 \$525.00	\$105.00
10/15/18	Newman, Lauren	Communication to R. Nelson, real estate broker, to send a copy of the title report for the 130th Street property	0.20 \$525.00	\$105.00
10/15/18	Newman, Lauren	Detailed communication to D. Brown, counsel for Debtor, to request information on the 130th Street property	0.20 \$525.00	\$105.00
10/15/18	Newman, Lauren	Prepare for conference call with trustee by reviewing comparable sales information	0.30 \$525.00	\$157.50
10/15/18	Newman, Lauren	Telephone conference with A. Moglia, trustee, and R. Nelson, real estate broker, to plan strategy re sale of the 130th Street property	0.50 \$525.00	\$262.50
10/18/18	Newman, Lauren	Multiple communications to and from A. Moglia, trustee's office re site visit to debtor's premises and obtaining copy of appraisal	0.30 \$525.00	\$157.50
10/19/18	Newman, Lauren	Communication to A. Moglia, trustee, report on site visit to debtor's premises at 130th Street	0.20 \$525.00	\$105.00
10/19/18	Newman, Lauren	Visit debtor's premises at 130th Street, Chicago, with real estate broker and to inspect premises and equipment	2.50 \$525.00	\$1,312.50
10/23/18	Newman, Lauren	Communication to A. Moglia, trustee, with copy of appraisal from Debtor from 2015 for the 130th Street property	0.20 \$525.00	\$105.00
10/31/18	Newman, Lauren	Review correspondence from M. Teich, counsel to R. Cullom, personal injury claimant, re preserving premises and inspection of same	0.20 \$525.00	\$105.00

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Date	Attorney/ Paralegal	Description	Hours	Amount
11/06/18	Newman, Lauren	Telephone call with A. Moglia, trustee, to plan strategy re sale of property	0.20 \$525.00	\$105.00
11/07/18	Newman, Lauren	Communication to R. Nelson, real estate broker, with copy of court order and court approved listing agreement	0.20 \$525.00	\$105.00
11/08/18	Newman, Lauren	Analysis of Debtor's sale of trucks and trailers pre-bankruptcy	0.50 \$525.00	\$262.50
11/08/18	Newman, Lauren	Telephone call with R. Nelson, real estate broker, to analyze market values and discuss possible listing price for property of the estate	0.50 \$525.00	\$262.50
11/15/18	Newman, Lauren	Telephone call with J. Gallo, Moglia Advisors, to plan strategy re pre-petition sales of assets by debtor	0.50 \$525.00	\$262.50
12/03/18	Newman, Lauren	Telephone call with D. Goris, counsel to Kingdom Farms, re offer to purchase Debtor's real property	0.10 \$525.00	\$52.50
12/03/18	Newman, Lauren	Communications to and from J. Gallo at Moglia Advisors re timing for auction of equipment	0.20 \$525.00	\$105.00
12/03/18	Newman, Lauren	Communication to A. Moglia, trustee, re conversation with D. Goris, counsel to Kingdom Farms, re offer to purchase debtor's real property	0.20 \$525.00	\$105.00
12/10/18	Newman, Lauren	Communication to and from R. Nelson, real estate broker, re offer to purchase property from tenant	0.10 \$525.00	\$52.50
12/13/18	Newman, Lauren	Telephone call with A. Moglia, trustee, and R. Nelson, real estate broker, to analyze offer and plan strategy re sale of real estate	0.90 \$525.00	\$472.50
12/20/18	Newman, Lauren	Communication to R. Nelson, real estate broker, to request conference call with J. Longo, creditor of debtor	0.10 \$525.00	\$52.50
12/20/18	Newman, Lauren	Communication to J. Longo, judgment creditor, to request a conference call to discuss the real estate sale	0.20 \$525.00	\$105.00
12/24/18	Newman, Lauren	Communication to D. Brown, counsel for debtor, re contacting prospective purchaser	0.10 \$525.00	\$52.50
12/27/18	Newman, Lauren	Communication to A. Moglia, trustee, to advise real estate contract needs to be prepared by counsel due to subject to court approval and 363 auction sale	0.20 \$525.00	\$105.00
12/28/18	Newman, Lauren	Multiple communications to and from J. Inendino, real estate counsel, re drafting a real estate contract for K. Moran of Kingdom	0.20 \$525.00	\$105.00

Date	Attorney/ Paralegal	Description	Hours	Amount
		Farms to be contract purchaser and stalking horse for 363 sale		
12/28/18	Inendino, James V.	Communications to and from Lauren Newman re drafting contract (.3); review title/letter report (.2)	0.50 \$510	\$255.00
12/28/18	Newman, Lauren	Communication to A. Moglia, trustee, to introduce J. Inendino, who will be assisting with real estate sale	0.10 \$525.00	\$52.50
01/03/19	Newman, Lauren	Communication to A. Moglia, trustee, to comment on letter of intent from Martinez Produce to purchase real estate	0.20 \$555.00	\$111.00
01/03/19	Newman, Lauren	Review and analyze letter of intent from K. Kauffman, counsel to Martinez Produce, re offer to purchase real estate	0.30 \$555.00	\$166.50
01/03/19	Newman, Lauren	Communications to and from S. Stabner from Heath Industrial, re value of personal property assets	0.20 \$555.00	\$111.00
01/03/19	Newman, Lauren	Communication to S. Stabner of Heath Industrial, to advise to put auction sale of equipment on hold while trustee pursues one of the offers	0.20 \$555.00	\$111.00
01/03/19	Newman, Lauren	Communication to and from S. Stabner of Heath Industrial, re value of debtor's personal property and equipment	0.10 \$555.00	\$55.50
01/04/19	Inendino, James V.	Draft Purchase and Sale Agreement	3.50 \$510	\$1,890.00
01/04/19	Newman, Lauren	Communications to and from J. Inendino, real estate counsel, re preparing real estate contract for sale motion	0.30 \$555.00	\$166.50
01/04/19	Newman, Lauren	Communications to and from R. Nelson, real estate broker, re another offer on the real property	0.20 \$555.00	\$111.00
01/05/19	Newman, Lauren	Communication to A. Moglia, trustee and R. Nelson, broker, to plan and prepare for a 363 sale and the stalking horse bidder	0.30 \$555.00	\$166.50
01/07/19	Newman, Lauren	Correspondence to K. Kauffman, counsel for Martinez Seafood, re letter of intent and potential purchase of debtor's real property, and to schedule a conference call with trustee and broker	0.30 \$555.00	\$166.50
01/07/19	Inendino, James V.	Communication to and from L. Newman re conference call with trustee and potential purchaser's counsel	0.30 \$540.00	\$162.00
01/07/19	Newman, Lauren	Correspondence to R. Nelson, broker, and J. Inendino, real estate counsel, re conference	0.10 \$555.00	\$55.50

Date	Attorney/ Paralegal	Description	Hours	Amount
		call with trustee and potential purchaser's counsel		
01/08/19	Inendino, James V.	Review LOIs (.5); prepare for conference call with trustee and purchaser (.5); telephone conference call A. Moglia, trustee, regarding Sale and Purchase Agreement (.5)	1.50 \$540.00	\$810.00
01/08/19	Newman, Lauren	Telephone conference with K. Kauffman, counsel to Martinez Seafood, R. Nelson, broker, and A. Moglia, trustee, to review letter of intent and to discuss sale process with potential purchaser	0.50 \$555.00	\$277.50
01/09/19	Inendino, James V.	Conference with L. Newman re: bankruptcy stalking horse issues	0.30 \$540.00	\$162.00
01/11/19	Newman, Lauren	Communication to A. Moglia, trustee, to comment on buyers including equipment into bids on real property	0.20 \$555.00	\$111.00
01/11/19	Newman, Lauren	Communication to J. Gallo re factoring in sale of equipment into sale of real estate	0.20 \$555.00	\$111.00
01/11/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to review offers to purchase real property and to plan strategy	0.20 \$555.00	\$111.00
01/11/19	Newman, Lauren	Telephone call with K. Kauffman, counsel for Martinez Seafood, re offer to purchase real property	0.20 \$555.00	\$111.00
01/16/19	Newman, Lauren	Communication to R. Nelson, broker, to follow up on offers to purchase debtor's real property	0.20 \$555.00	\$111.00
01/17/19	Newman, Lauren	Telephone call with K. Kauffman, counsel for Martinez Seafood, to discuss revised offer to purchase debtor's real estate	0.20 \$555.00	\$111.00
01/17/19	Newman, Lauren	Telephone call with R. Nelson, real estate broker, to review competing offers to purchase debtor's real estate and to plan how to proceed	0.20 \$555.00	\$111.00
01/17/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to plan response to multiple offers to purchase property	0.20 \$555.00	\$111.00
01/17/19	Newman, Lauren	Communication to R. Nelson, real estate broker, to request a conference call on competing offers to purchase debtor's real estate	0.10 \$555.00	\$55.50
01/17/19	Newman, Lauren	Communication to K. Kauffman, counsel for Martinez Seafood, to request revised offer to purchase debtor's real estate be put in writing in a LOI	0.20 \$555.00	\$111.00

Date	Attorney/ Paralegal	Description	Hours	Amount
01/17/19	Newman, Lauren	Detailed communication to A. Moglia, trustee, and J. Gallo, re recommendations by R. Nelson re proceeding with bids on real estate	0.30 \$555.00	\$166.50
01/17/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to advise on revised offer from Martinez Seafood	0.10 \$555.00	\$55.50
01/21/19	Newman, Lauren	Communication to S. Stabner from Heath Industrial to respond to inquiry on status of auction	0.10 \$555.00	\$55.50
01/24/19	Inendino, James V.	Conference with Lauren Newman re procedure for bidding on property	0.20 \$540.00	\$108.00
01/24/19	Newman, Lauren	Communication to K. Kaufman, counsel for Martinez Seafood, re procedure for bidding on property	0.20 \$555.00	\$111.00
01/25/19	Newman, Lauren	Communications to and from R. Nelson, broker, re terms and conditions of sale to be conveyed to potential purchaser K. Moran, including increase in down payment	0.30 \$555.00	\$166.50
01/25/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to plan strategy re auction sale of real property	0.70 \$555.00	\$388.50
01/25/19	Newman, Lauren	Communications to and from K. Kaufman, counsel to Martinez Seafood, re decision by Trustee on stalking horse bidder	0.20 \$555.00	\$111.00
01/25/19	Newman, Lauren	Communication to R. Nelson, real estate broker, re requesting an updated LOI from K. Moran re latest offer to purchase real property	0.20 \$555.00	\$111.00
01/25/19	Newman, Lauren	Review and revise purchase and sale agreement for real estate	0.40 \$555.00	\$222.00
01/29/19	Newman, Lauren	Communication to A. Moglia, trustee to advise on call with K. Kaufman, counsel for Martinez Seafood, and possible contract terms and sale process	0.20 \$555.00	\$111.00
01/29/19	Newman, Lauren	Telephone call with K. Kaufman, counsel for Martinez Seafood, to advise on terms for bidding at sale and possible contract terms	0.20 \$555.00	\$111.00
02/01/19	Newman, Lauren	Communication to R. Nelson, broker, and A. Moglia, trustee, re revised offer and increased down payment from one of the purchasers	0.20 \$555.00	\$111.00
02/01/19	Newman, Lauren	Communications to and from K. Kaufman, counsel for Martinez, re decision on offer	0.10 \$555.00	\$55.50
02/05/19	Inendino, James V.	Conference with L. Newman and review emails regarding contract	0.30 \$540.00	\$162.00

Date	Attorney/ Paralegal	Description	Hours	Amount
02/05/19	Newman, Lauren	Begin to review and revise purchase and sale agreement and sale notice	1.50 \$555.00	\$832.50
02/05/19	Newman, Lauren	Telephone conference with A. Moglia, trustee, J. Gallo, Moglia Advisors, and R. Nelson, real estate broker, to select stalking horse bidder and to plan bidding procedures	0.90 \$555.00	\$499.50
02/07/19	Inendino, James V.	Draft Contract, Lease Termination Agreement (4.2); email to Lauren Newman re same (.3)	4.50 \$540.00	\$2,430.00
02/08/19	Newman, Lauren	Communication on A. Moglia, trustee, with draft of purchase and sale agreement and lease termination agreement for his review and approval	0.20 \$555.00	\$111.00
02/08/19	Newman, Lauren	Review draft of purchase and sale agreement and lease termination agreement	0.50 \$555.00	\$277.50
02/08/19	Newman, Lauren	Telephone call with K. Kaufman, counsel to Martinez, to advise that Martinez will not be stalking horse but to come to auction	0.20 \$555.00	\$111.00
02/10/19	Inendino, James V.	Communications to and from L. Newman re comments and changes to draft Purchase Agreement	0.40 \$540.00	\$216.00
02/11/19	Inendino, James V.	Communications to and from title company regarding new order (.5); conference with Lauren Newman re contract issues (.2)	0.70 \$540.00	\$378.00
02/11/19	Newman, Lauren	Communication to B. Liston, counsel to K. Moran, to send draft of the Purchase and Sale Agreement and Lease Termination Agreement	0.30 \$555.00	\$166.50
02/11/19	Newman, Lauren	Telephone call with B. Liston, counsel for K. Moran, to review auction sale process, and rejection of lease if K. Moran is not successful bidder	0.30 \$555.00	\$166.50
02/12/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to plan strategy re sale of assets	0.50 \$555.00	\$277.50
02/12/19	Newman, Lauren	Telephone call with K. Moran, to advise on sale procedures for debtor's real property	0.20 \$555.00	\$111.00
02/12/19	Newman, Lauren	Communication to B. Liston, counsel to K. Moran, to advise on telephone conference with Moran and sale procedures for debtor's real property	0.20 \$555.00	\$111.00
02/12/19	Newman, Lauren	Communication to B. Liston and T. Goodwyn, counsel to K. Moran, re comments to contract	0.10 \$555.00	\$55.50
02/12/19	Newman, Lauren	Communication to A. Moglia, trustee, re updated offer on debtor's real property	0.20 \$555.00	\$111.00

Date	Attorney/ Paralegal	Description	Hours	Amount
02/12/19	Inendino, James V.	Conference with Lauren Newman regarding stalking horse bid offer and lease termination issues	0.40 \$540.00	\$216.00
02/12/19	Newman, Lauren	Communication to K. Kaufman, counsel to potential purchaser, re updated offer on debtor's real property	0.10 \$555.00	\$55.50
02/13/19	Newman, Lauren	Telephone call with T. Goodwyn, counsel for K. Moran, to follow up on comments to draft purchase agreement	0.10 \$555.00	\$55.50
02/14/19	Inendino, James V.	Emails with A. Moglia, trustee, re Stalking Horse Contract and emails with T. Goodwyn, counsel for purchaser, re same	0.50 \$540.00	\$270.00
02/14/19	Newman, Lauren	Telephone call with T. Goodwyn, counsel for K. Moran, to discuss points in purchase agreement and negotiate amount of breakup fee	0.30 \$555.00	\$166.50
02/14/19	Newman, Lauren	Review comments and proposed changes from T. Goodwyn, counsel for K. Moran, to purchase agreement	0.30 \$555.00	\$166.50
02/14/19	Newman, Lauren	Communication to T. Goodwyn, counsel for K. Moran, to advise on Trustee's position on proposed changes to draft purchase and sale agreement	0.20 \$555.00	\$111.00
02/14/19	Newman, Lauren	Communication to T. Goodwyn, counsel for K. Moran, to request comments to purchase agreement	0.10 \$555.00	\$55.50
02/15/19	Newman, Lauren	Review recent revisions and comments to purchase agreement from counsel for purchaser	0.20 \$555.00	\$111.00
02/15/19	Inendino, James V.	Revise Stalking Horse Bid contract and memo to client and Lauren Newman re same (1.3); review various emails to and from A. Moglia, J. Gallo re Stalking Horse Bid contract (.2)	1.50 \$540.00	\$810.00
02/15/19	Newman, Lauren	Communication to J. Inendino, real estate counsel, to comment on recent revisions and comments to purchase agreement from counsel for purchaser	0.20 \$555.00	\$111.00
02/15/19	Newman, Lauren	Continue to draft sale motion and procedures notice of sale	1.50 \$555.00	\$832.50
02/18/19	Newman, Lauren	Plan strategy re revisions to draft purchase agreement	0.20 \$555.00	\$111.00
02/18/19	Newman, Lauren	Communication to T. Goodwyn, counsel for K. Moran, to negotiate purchase agreement	0.20 \$555.00	\$111.00

Date	Attorney/ Paralegal	Description	Hours	Amount
02/18/19	Inendino, James V.	Communications to and from T. Goodwyn, Buyer's counsel, re changes to purchase and sale agreement	0.50 \$540.00	\$270.00
02/19/19	Inendino, James V.	Telephone conference with A. Moglia, L. Newman and T. Goodwyn, Buyer's Counsel, re purchase and sale agreement	0.80 \$540.00	\$432.00
02/19/19	Newman, Lauren	Communication to T. Goodwyn, counsel for K. Moran, re proposed changes to the purchase and sale agreement and to request a conference call	0.20 \$555.00	\$111.00
02/19/19	Newman, Lauren	Communications to and from J. Gallo, Moglia Advisors, re list of equipment included in asset sale	0.30 \$555.00	\$166.50
02/19/19	Newman, Lauren	Communications to and from R. Nelson, real estate broker, re status of contract negotiations	0.20 \$555.00	\$111.00
02/19/19	Newman, Lauren	Telephone conference with A. Moglia, J. Inendino and T. Goodwyn, counsel for purchaser, to negotiate PSA and proposed changes to the purchase and sale agreement	0.80 \$555.00	\$444.00
02/19/19	Newman, Lauren	Telephone conference with T. Goodwyn, counsel for K. Moran, to negotiate changes to the purchase and sale agreement	0.60 \$555.00	\$333.00
02/19/19	Newman, Lauren	Draft proposed order setting auction, bidding procedures and approving sale	1.50 \$555.00	\$832.50
02/20/19	Inendino, James V.	Revise Purchase Contract (.7); memo to L. Newman re same (.1); communication to Goodwyn, Purchaser's counsel, with draft Agreement (.1)	0.90 \$540.00	\$486.00
02/20/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to plan strategy in contract negotiations with K. Moran's counsel	0.20 \$555.00	\$111.00
02/20/19	Newman, Lauren	Detailed communication to A. Moglia, trustee, and J. Gallo, Moglia Advisors, re points in contract negotiations with K. Moran's counsel	0.30 \$555.00	\$166.50
02/21/19	Newman, Lauren	Legal research for sale motion re cases on break-up fees and other issues to cite case law in sale motion	1.50 \$555.00	\$832.50
02/21/19	Inendino, James V.	Review K. Moran's comments to purchase and sale agreement and lease termination agreement (.3); memo to L. Newman re same (.1)	0.40 \$540.00	\$216.00
02/21/19	Newman, Lauren	Telephone call with J. Gallo, Moglia Advisors, to plan strategy re sale of real estate	0.70 \$555.00	\$388.50

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Date	Attorney/ Paralegal	Description	Hours	Amount
02/21/19	Newman, Lauren	Review and revise purchase agreement, and create a redlined version re additional contract provisions for bankruptcy sale	0.30 \$555.00	\$166.50
02/21/19	Newman, Lauren	Continue to draft motion by trustee to sell assets of bankruptcy estate	1.50 \$555.00	\$832.50
02/21/19	Newman, Lauren	Communication to T. Goodwin, counsel for K. Moran, with revise purchase agreement, and along with a redlined version re additional contract provisions	0.20 \$555.00	\$111.00
02/21/19	Newman, Lauren	Communication to A. Moglia, trustee, with additional proposed changes to contract and comments on same	0.30 \$555.00	\$166.50
02/21/19	Newman, Lauren	Telephone call with A. Moglia, trustee, re additional contract provisions	0.20 \$555.00	\$111.00
02/22/19	Newman, Lauren	Continue to draft and revise motion to sell assets, draft order and notice of bidding procedures	4.50 \$555.00	\$2,497.50
02/22/19	Newman, Lauren	Legal research to cite case law in sale motion on break-up fees, on business judgment rule and other issues in support of trustee's motion to sell assets, including good faith	1.50 \$555.00	\$832.50
02/25/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to plan strategy re sale	0.20 \$555.00	\$111.00
02/25/19	Newman, Lauren	Receive and review executed purchase agreement from T. Goodwyn, counsel for K. Moran, and communicate to acknowledge same	0.20 \$555.00	\$111.00
02/25/19	Newman, Lauren	Communication to A. Moglia, trustee, to send draft of trustee's motion to sell assets, set bidding procedures, schedule an auction, and proposed sale order for his review	0.20 \$555.00	\$111.00
02/25/19	Inendino, James V.	Review and analyze Title Commitment and send memo to L. Newman re title status	0.50 \$540.00	\$270.00
02/25/19	Newman, Lauren	Continue to draft and revise trustee's motion to sell assets, set bidding procedures, schedule an auction, and revise proposed sale order	3.70 \$555.00	\$2,053.50
02/26/19	Inendino, James V.	Review emails regarding signed contract; memo to Stalking Horse Buyer counsel re same	0.40 \$540.00	\$216.00
02/26/19	Newman, Lauren	Communication to A. Moglia, trustee, to send court filed copy of sale motion and to plan for court hearing	0.20 \$555.00	\$111.00

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Date	Attorney/ Paralegal	Description	Hours	Amount
02/26/19	Newman, Lauren	Continue to draft and proof read sale motion, organize exhibits and prepare for filing with court	2.30 \$555.00	\$1,276.50
02/27/19	Inendino, James V.	Telephone conference with T. Goodwyn, purchaser's counsel, re changes to the purchase and sale agreement (.3); communication to T. Goodwyn confirming changes to contract (.2)	0.60 \$540.00	\$324.00
02/27/19	Newman, Lauren	Communication to T. Goodwyn, counsel to K. Moran, to advise on court hearing and delay of sale motion and auction	0.20 \$555.00	\$111.00
02/27/19	Newman, Lauren	Communications to and from T. Goodwyn, counsel to K. Moran, to consider possible timing issues on the sale	0.20 \$555.00	\$111.00
02/27/19	Newman, Lauren	Revise and prepare amended motion to sell assets, notice of order and bid procedures, proposed sale order and amended notice of motion	1.20 \$555.00	\$666.00
02/28/19	Inendino, James V.	Conference with Near North Title re proposed sale (.2); telephone conference with T. Goodwyn, purchaser's counsel regarding earnest money deposit and strict joint order instructions (.3)	0.50 \$540.00	\$270.00
02/28/19	Newman, Lauren	Communication to K. Kaufman, counsel for Martinez Seafood, re delay in hearing of motion to sell assets, and to explain amended motion and amended notice	0.20 \$555.00	\$111.00
03/01/19	Newman, Lauren	Communications to and from J. Inendino re wire of deposit to title company escrow	0.20 \$555.00	\$111.00
03/01/19	Inendino, James V.	Communications to and from title company and to A. Moglia, trustee, regarding earnest money deposit	0.20 \$540.00	\$108.00
03/06/19	Inendino, James V.	Review contract and critical dates for closing	0.30 \$540.00	\$162.00
03/07/19	Inendino, James V.	Communication to and from Liz Zydel re water certificate and closing matters	0.30 \$540.00	\$162.00
03/08/19	Inendino, James V.	Communication to and from E. Zydel and Buyer's counsel re: water certificate and closing issues	0.30 \$540.00	\$162.00
03/08/19	Zydel, Elizabeth B.	Review communication from J. Inendino including the purchase and sale agreement, title and other title documents (.3) ; prepare full payment water certificate application (.2); prepare communication to R. DeGraff of MGR attaching full payment water certificate	0.70 \$250.00	\$175.00

Date	Attorney/ Paralegal	Description	Hours	Amount
		and executed purchase and sale agreement for processing (.2)		
03/13/19	Newman, Lauren	Telephone call with A. Moglia, trustee to plan strategy and consider environmental issues at property and purchaser's request for extension of due diligence	0.30 \$555.00	\$166.50
03/13/19	Inendino, James V.	Review and respond to communications from T. Goodwyn, purchaser's attorney, regarding due diligence extension request and environmental matters with respect to the property	0.30 \$540.00	\$162.00
03/13/19	Newman, Lauren	Communications to A. Moglia, trustee re request for extension of due diligence from T. Goodwyn, counsel for purchaser, for a phase II environmental report	0.10 \$555.00	\$55.50
03/13/19	Newman, Lauren	Communications to and from T. Goodwyn, counsel for purchaser, re request for extension of time on due diligence and to do a phase II	0.20 \$555.00	\$111.00
03/14/19	Newman, Lauren	Communication to R. Nelson, broker, re request for extension from purchaser on due diligence	0.20 \$555.00	\$111.00
03/14/19	Newman, Lauren	Communication to A. Moglia, trustee, re property inspection by personal injury claimant and insurance defense counsel	0.10 \$555.00	\$55.50
03/14/19	Inendino, James V.	Review buyer's request for due diligence extension	0.20 \$540.00	\$108.00
03/14/19	Inendino, James V.	Memo to buyer's counsel regarding due diligence extension request response	0.30 \$540.00	\$162.00
03/15/19	Newman, Lauren	Communication to A. Moglia, trustee, to send request by purchaser's counsel for extension of due diligence	0.20 \$555.00	\$111.00
03/15/19	Newman, Lauren	Communications to and from J. Brucer re selling debtor's trademark and tradename	0.10 \$555.00	\$55.50
03/18/19	Inendino, James V.	Review emails regarding due diligence extension matters for amendment to contract	0.30 \$540.00	\$162.00
03/19/19	Newman, Lauren	Review sale motion and prepare for upcoming court hearing	0.20 \$555.00	\$111.00
03/19/19	Newman, Lauren	Review amendment to purchase agreement extending due diligence for environmental report	0.20 \$555.00	\$111.00

Date	Attorney/ Paralegal	Description	Hours	Amount
03/19/19	Newman, Lauren	Communication to A. Moglia, trustee, amendment to purchase agreement extending due diligence will push out date of auction	0.20 \$555.00	\$111.00
03/19/19	Inendino, James V.	Communication to A. Moglia, trustee, transmitting first amendment to contract	0.20 \$540.00	\$108.00
03/19/19	Inendino, James V.	Conference with L. Newman regarding first amendment to contract	0.20 \$540.00	\$108.00
03/19/19	Zydel, Elizabeth B.	Receive notice from Sandy at MGR advising that there is an open balance due in order to certify the full payment water certificate (.1); prepare communication to J. Inendino advising of same and forwarding notification (.1)	0.20 \$250.00	\$50.00
03/19/19	Inendino, James V.	Draft and revise first amendment to contract	1.10 \$540.00	\$594.00
03/20/19	Newman, Lauren	Appear in court on Trustee's motion to approve auction sale bidding procedures	1.40 \$555.00	\$777.00
03/20/19	Newman, Lauren	Respond to communication from D. Brown, counsel for debtor, to advise on outcome of court hearing on sale motion	0.10 \$555.00	\$55.50
03/20/19	Newman, Lauren	Communication to T. Goodwyn, counsel for K. Moran, to comment on court hearing for motion to approve sale procedures	0.20 \$555.00	\$111.00
03/20/19	Inendino, James V.	Communication to T. Goodwyne, counsel for purchaser, transmitting first amendment to contract	0.30 \$540.00	\$162.00
03/20/19	Newman, Lauren	Respond to communication from G. Silver, counsel for U.S. Trustee, to advise on outcome of court hearing on sale motion	0.20 \$555.00	\$111.00
03/28/19	Newman, Lauren	Correspondence to Clerk of Judge Barnes with proposed draft of sale procedures order	0.30 \$555.00	\$166.50
03/28/19	Newman, Lauren	Revise and update proposed order authorizing trustee to sell assets by auction and allowing for sale procedures and break-up fee	0.40 \$555.00	\$222.00
03/29/19	Newman, Lauren	Communications with bankruptcy judge's clerk re resubmitting proposed sale procedures order with no references to sale motion	0.10 \$555.00	\$55.50
03/29/19	Newman, Lauren	Draft and revise sale procedures order to include all bidding terms and instructions, along with all conditions of participating in auction sale	1.20 \$555.00	\$666.00
03/29/19	Newman, Lauren	Revise notice of sale procedures	0.60	\$333.00

Date	Attorney/ Paralegal	Description	Hours	Amount
			\$555.00	
04/01/19	Newman, Lauren	Communication to L. Hiller, law clerk, with revised proposed sale procedures order	0.20 \$555.00	\$111.00
04/01/19	Newman, Lauren	Continue to revise proposed sale procedures order and notice of entry of order, and prepare for filing	0.50 \$555.00	\$277.50
04/02/19	Newman, Lauren	Communication to A. Moglia, trustee, with copy of notice of sale and procedures	0.10 \$555.00	\$55.50
04/02/19	Newman, Lauren	Communication to A. Moglia, trustee, with entered sale procedures order	0.20 \$555.00	\$111.00
04/02/19	Newman, Lauren	Communications to A. Moglia, trustee, re strategy on sale and possible appeal by J. Longo	0.20 \$555.00	\$111.00
04/02/19	Newman, Lauren	Prepare notice of sale procedures and certificate of filing and service	0.40 \$555.00	\$222.00
04/04/19	Newman, Lauren	Communications to and from T. Goodwyn, counsel for K. Moran, re bidding procedures	0.20 \$555.00	\$111.00
04/11/19	Newman, Lauren	Communications to and from K. Kaufman, counsel for Martinez, to prepare for upcoming sale	0.10 \$555.00	\$55.50
04/11/19	Newman, Lauren	Telephone conference with A. Moglia, trustee, to prepare for upcoming auction sale	0.10 \$555.00	\$55.50
04/12/19	Newman, Lauren	Communication to A. Moglia, trustee, to advise on sale developments	0.20 \$555.00	\$111.00
04/12/19	Newman, Lauren	Draft notice of publication of sale	1.50 \$555.00	\$832.50
04/15/19	Newman, Lauren	Communications to and from J. Gallo, Moglia Advisors, re possible changes to draft of Notice of Publication of the Sale	0.20 \$555.00	\$111.00
04/15/19	Newman, Lauren	Proof read and revise Notice of Publication of the Sale	0.20 \$555.00	\$111.00
04/15/19	Newman, Lauren	Communication to A. Moglia, trustee, re status of sale and inclusion of potential bidders	0.20 \$555.00	\$111.00
04/15/19	Newman, Lauren	Revise Notice of Publication of the Sale as per directions of trustee, to include sale amounts and bidding amounts	1.20 \$555.00	\$666.00
04/15/19	Newman, Lauren	Communication to A. Moglia, trustee, with draft of Notice of Publication of the Sale	0.20 \$555.00	\$111.00
04/16/19	Newman, Lauren	Communication to A. Moglia, trustee, with revised notice of publication	0.20 \$555.00	\$111.00
04/24/19	Newman, Lauren	Telephone call with potential purchaser from ad for auction sale	0.20 \$555.00	\$111.00
04/24/19	Newman, Lauren	Plan and prepare for auction sale	0.20 \$555.00	\$111.00

Date	Attorney/ Paralegal	Description	Hours	Amount
04/25/19	Newman, Lauren	Communication to A. Moglia, trustee, re inquiry on the sale	0.10 \$555.00	\$55.50
04/25/19	Newman, Lauren	Communication to R. Nelson, real estate broker, to send copy of notice sale of auction sale	0.20 \$555.00	\$111.00
04/25/19	Newman, Lauren	Telephone call with R. Nelson, real estate broker, re progress of sale of real estate and bidding process	0.40 \$555.00	\$222.00
04/29/19	Newman, Lauren	Communications to and from C. Angelo, potential purchaser of equipment, re sale	0.20 \$555.00	\$111.00
04/29/19	Newman, Lauren	Communications to C. Angelo, potential purchaser of equipment, to advise on sale of assets	0.10 \$555.00	\$55.50
04/29/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to consider offer from C. Angelo, potential purchaser of equipment, re sale	0.30 \$555.00	\$166.50
04/30/19	Newman, Lauren	Communication to T. Goodwyn, counsel for purchaser re phase II environmental report and to advise that the trustee will not remediate any environmental issues	0.20 \$555.00	\$111.00
04/30/19	Newman, Lauren	Analysis of phase II environmental report send by purchaser on due diligence	0.30 \$555.00	\$166.50
		Total Charges	88.40	\$48,124.50

## **EXHIBIT D**

**Relief from Stay by J. Longo, creditor:**

Date	Attorney/ Paralegal	Description	Hours	Amount
12/11/18	Newman, Lauren	Review and analyze motion to for relief from automatic stay filed by J. Longo, judgment creditor, to pursue appeal of attorneys' fee award by district court	0.30 \$525.00	\$157.50
12/11/18	Newman, Lauren	Communications to and from A. Moglia, trustee, re motion to lift stay filed by J. Longo, judgment creditor, of district court's attorneys' fee award	0.20 \$525.00	\$105.00
12/11/18	Newman, Lauren	Communication to A. Moglia, trustee, to plan strategy re to lift stay filed by J. Longo for attorneys' fees	0.20 \$525.00	\$105.00
12/12/18	Moore, Dremain T.	Legal research cases on relief from stay by creditor to pursue appeal of a judgment after Chapter 7 filing	1.50 \$335.00	\$502.50
12/12/18	Moore, Dremain T.	Research cases cited in motion to lift stay, and analyze same	1.50 \$335.00	\$502.50
12/13/18	Newman, Lauren	Review results of legal research on judgment creditor's motion for relief from automatic stay	0.80 \$525.00	\$420.00
12/17/18	Newman, Lauren	Begin to draft response and objection to J. Longo's motion for relief from stay	1.50 \$525.00	\$787.50
12/18/18	Newman, Lauren	Legal research re review and analyze case law cited by judgment creditor J. Longo's motion for relief from stay	1.20 \$525.00	\$1,470.00
12/18/18	Newman, Lauren	Draft and revise Trustee's response to J. Longo's motion for relief from automatic stay to pursue appeal of attorneys' fee award	2.80 \$525.00	\$630.00
12/19/18	Newman, Lauren	Communication to J. Longo, judgment creditor, to request conference call	0.10 \$525.00	\$52.50
12/19/18	Newman, Lauren	Detailed communication to J. Longo, judgment creditor, re expending assets of estate to defend an appeal reduces amount to creditors	0.20 \$525.00	\$105.00
12/19/18	Newman, Lauren	Telephone call A. Moglia, trustee, to plan strategy re judgment creditor J. Longo's motion for relief from stay	0.80 \$525.00	\$420.00

) Improper location

Date	Attorney/ Paralegal	Description	Hours	Amount
12/19/18	Newman, Lauren	Telephone call with J. Longo, judgment creditor, to review impact of an appeal of his attorneys' fees, which increases expenses to creditors	0.40 \$525.00	\$210.00
12/19/18	Newman, Lauren	Appear in court for judgment creditor J. Longo's motion for relief from stay	1.30 \$525.00	\$682.50
12/20/18	Newman, Lauren	Communication to J. Longo, judgment creditor, to request a meeting with the trustee	0.20 \$525.00	\$105.00
12/27/18	Newman, Lauren	Communication to A. Moglia, trustee, to advise J. Longo had not responded to invitation to meet and confer	0.10 \$525.00	\$52.50
01/03/19	Newman, Lauren	Communications to J. Longo, judgment creditor, on Longo's declining a settlement conference with trustee	0.10 \$555.00	\$55.50
01/03/19	Newman, Lauren	Communication to J. Longo, judgment creditor, to advise on status of sale, progress of liquidation of assets, and invite Longo to a conference with Trustee	0.40 \$555.00	\$222.00
01/04/19	Newman, Lauren	Communication to A. Moglia, trustee, to advise that J. Longo does not wish to meet with trustee for settlement discussion	0.10 \$555.00	\$55.50
		<b>Total Hours and Charges</b>	<b>13.70</b>	<b>\$6,640.50</b>
		<b>TOTAL Hours and Fees</b>	<b>235.30</b>	<b>\$126,460.00</b>

## **EXHIBIT E**

**Motion to Dismiss and Appeal:**

Date	Attorney/ Paralegal	Description	Hours	Amount
01/07/19	Newman, Lauren	Telephone call with J. Gallo, Moglia Advisors, to review motion to dismiss filed by J. Longo, judgment creditor	0.20 \$555.00	\$111.00
01/07/19	Newman, Lauren	Telephone conference with A. Moglia, trustee, and J. Gallo, Moglia Advisors, to analyze motion to dismiss filed by J. Longo	0.20 \$555.00	\$111.00
01/07/19	Newman, Lauren	Review and analyze motion to dismiss bankruptcy case filed by J. Longo, judgment creditor	0.30 \$555.00	\$166.50
01/07/19	Newman, Lauren	Communications to and from A. Moglia, trustee, and J. Gallo, Moglia Advisors, to comment on motion to dismiss filed by J. Longo, judgment creditor	0.30 \$555.00	\$166.50
01/08/19	Newman, Lauren	Analysis of motion to dismiss filed by J. Longo, judgment creditor	0.40 \$555.00	\$222.00
01/08/19	Newman, Lauren	Communication to D. Brown, counsel for debtor, to request conference call on J. Longo's motion to dismiss	0.20 \$555.00	\$111.00
01/08/19	Newman, Lauren	Communication to J. Gallo, Moglia Advisors, to comment on analysis of motion to dismiss and progress of bankruptcy case	0.10 \$555.00	\$55.50
01/08/19	Newman, Lauren	Review and analyze memorandum from J. Gallo, Moglia Advisors, re analysis of motion to dismiss and progress of bankruptcy case	0.20 \$555.00	\$111.00
01/08/19	Newman, Lauren	Telephone conference with A. Moglia, trustee, to review and analyze motion to dismiss and to plan strategy	0.40 \$555.00	\$222.00
01/09/19	O'Keefe, Julie L.	Obtain, compile and organize law cited in J. Longo's motion to dismiss bankruptcy case, in preparation for response to same	1.10 \$555.00	\$308.00
01/09/19	Newman, Lauren	Telephone call with D. Brown, counsel for debtor, to review and analyze Longo's motion to dismiss and plan for upcoming hearing	0.40 \$555.00	\$222.00
01/09/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to advise on telephone conference with D. Brown, counsel for debtor, and consider trustee's position on motion to dismiss	0.30 \$555.00	\$166.50

Date	Attorney/ Paralegal	Description	Hours	Amount
01/09/19	Newman, Lauren	Communications to and from D. Brown, counsel for debtor, re motion to dismiss bankruptcy case filed by J. Longo, judgment creditor	0.20 \$555.00	\$111.00
01/09/19	Newman, Lauren	Communication to A. Moglia, trustee, re motion to dismiss bankruptcy case filed by J. Longo, judgment creditor	0.30 \$555.00	\$166.50
01/10/19	Newman, Lauren	Legal research grounds for motion to dismiss a corporate Chapter 7 for substantial abuse	1.20 \$555.00	\$666.00
01/11/19	Newman, Lauren	Detailed, formal written correspondence to J. Longo, Judgment creditor, to advise on trustee's activities, sale of assets and trustee's settlement position	1.90 \$555.00	\$1,054.50
01/14/19	Newman, Lauren	Revise correspondence to J. Longo, judgment creditor, to advise on activities of trustee and request withdrawal of motion to dismiss	2.20 \$555.00	\$1,221.00
01/16/19	Newman, Lauren	Communication to A. Moglia, trustee, and J. Gallo, Moglia Advisors, to send and comment on supplemental brief filed by J. Longo, judgment creditor, to motion to dismiss	0.20 \$555.00	\$111.00
01/16/19	Newman, Lauren	Communications to and from J. Gallo, Moglia Advisors, to analyze to motion to dismiss	0.30 \$555.00	\$166.50
01/16/19	Newman, Lauren	Review and analyze supplemental brief filed by J. Longo, judgment creditor, to motion to dismiss and prepare response to same	0.40 \$555.00	\$222.00
01/22/19	Newman, Lauren	Draft response to motion to J. Longo's dismiss bankruptcy case	3.20 \$555.00	\$1,776.00
01/22/19	Newman, Lauren	Communication to A. Moglia, trustee, re strategy on motion to dismiss and to plan for upcoming hearing	0.30 \$555.00	\$166.50
01/22/19	Newman, Lauren	Communication with D. Brown, counsel for debtor, re appearing at hearing on motion to dismiss	0.20 \$555.00	\$111.00
01/23/19	Newman, Lauren	Appear in court for J. Longo, judgment creditor, for hearing on motion for relief from automatic stay and motion to dismiss bankruptcy case	1.40 \$555.00	\$777.00
01/23/19	Newman, Lauren	Prepare for court argument by reviewing filed pleadings	0.30 \$555.00	\$166.50

Date	Attorney/ Paralegal	Description	Hours	Amount
01/24/19	Newman, Lauren	Communication to A. Moglia, trustee, to send copy of order and to comment on judge's remarks from court hearing	0.40 \$555.00	\$222.00
01/24/19	Newman, Lauren	Review order denying motion for relief from stay	0.10 \$555.00	\$55.50
01/29/19	Newman, Lauren	Communication to A. Moglia, trustee re responding to J. Longo's email requesting dismissal	0.10 \$555.00	\$55.50
01/29/19	Newman, Lauren	Communication to J. Longo, judgment creditor, to advise Trustee will not join in dismissal of case	0.10 \$555.00	\$55.50
01/31/19	Newman, Lauren	Communication to A. Moglia with J. Longo's motion to stay Trustee's work on case	0.20 \$555.00	\$111.00
01/31/19	Newman, Lauren	Communications to and from A. Moglia to plan for J. Longo's motion to stay case pending appeal	0.20 \$555.00	\$111.00
01/31/19	Newman, Lauren	Review and analyze J. Longo's motion for a stay pending appeal	0.20 \$555.00	\$111.00
02/01/19	Newman, Lauren	Legal research for trustee's response and objection to J. Longo's motion for stay before motion to dismiss is determined	1.50 \$555.00	\$832.50
02/01/19	Newman, Lauren	Communications to and from A. Moglia, trustee, to plan strategy re motion for stay	0.20 \$555.00	\$111.00
02/04/19	Newman, Lauren	Continue to draft and revise response and objection to J. Longo, judgment creditor, motion for stay, and prepare for filing	2.50 \$555.00	\$1,387.50
02/05/19	Newman, Lauren	Communication to A. Moglia, trustee, to advise on notice of withdrawal of notice of motion for a stay	0.20 \$555.00	\$111.00
02/05/19	Newman, Lauren	Review notice of withdrawal of notice of motion for a stay	0.20 \$555.00	\$111.00
02/12/19	Newman, Lauren	Legal research for trustee's response to motion to dismiss and review and analyze cases cited in motion	1.00 \$555.00	\$555.00
02/12/19	Newman, Lauren	Draft response brief to motion to dismiss by judgment creditor Longo	3.00 \$555.00	\$1,665.00
02/13/19	Newman, Lauren	Continue to draft and revise trustee's response brief to judgment creditor Longo's motion to dismiss bankruptcy case, and arrange for filing of final draft of brief	4.50 \$555.00	\$2,497.50

) Improper location

) Improper location

Date	Attorney/ Paralegal	Description	Hours	Amount
02/13/19	Newman, Lauren	Communication to A. Moglia, trustee, with court filed copy of trustee's response brief to judgment creditor Longo's motion to dismiss bankruptcy case	0.20 \$555.00	\$111.00
02/20/19	Newman, Lauren	Detailed communication to A. Moglia, trustee, and J. Gallo, Moglia Advisors, to send copy of reply brief to motion to dismiss bankruptcy case filed by J. Longo, and to comment on same	0.30 \$555.00	\$166.50
02/20/19	Newman, Lauren	Review and analyze reply to response to Longo's motion to dismiss bankruptcy case	0.30 \$555.00	\$166.50
02/27/19	Newman, Lauren	Appear in court for hearing for motion for a stay and status on motion to dismiss	1.40 \$555.00	\$777.00
02/27/19	Newman, Lauren	Prepare for court hearing by reviewing motion for stay, trustee's response and motion to dismiss pleadings	0.50 \$555.00	\$277.50
02/27/19	Newman, Lauren	Telephone call with A. Moglia, trustee, to review outcome of court hearing and to plan strategy	0.30 \$555.00	\$166.50
03/19/19	Newman, Lauren	Review and analyze order and opinion from Judge Barnes denying J. Longo's motion to dismiss bankruptcy case	0.30 \$555.00	\$166.50
03/19/19	Newman, Lauren	Multiple communications to and from A. Moglia, trustee, to review and analyze Judge Barnes denying J. Longo's motion to dismiss bankruptcy case	0.30 \$555.00	\$166.50
03/19/19	Newman, Lauren	Communication to A. Moglia, trustee, to send copy of Judge Barnes denying J. Longo's motion to dismiss bankruptcy case and comment on same	0.20 \$555.00	\$111.00
03/27/19	Newman, Lauren	Communication to J. Longo to respond to questions about outcome of last court hearing	0.20 \$555.00	\$111.00
04/02/19	Newman, Lauren	Communication to and from A. Moglia, trustee, re notice of appeal filed by creditor J. Longo	0.30 \$555.00	\$166.50
04/02/19	Newman, Lauren	Review notice of appeal filed by creditor Longo re denial of motion to dismiss case	0.20 \$555.00	\$111.00
04/03/19	Newman, Lauren	Legal research bankruptcy rules re notice of appeal and required documents with notice	0.30 \$555.00	\$166.50

) Improper location

Date	Attorney/ Paralegal	Description	Hours	Amount
04/03/19	Newman, Lauren	Review notice of appeal and motion for leave to appeal, and analyze same	0.50 \$555.00	\$277.50
04/05/19	Newman, Lauren	Communication to D. Farrell, bankruptcy partner, with notice of appeal and motion to appeal, for preparing response	0.20 \$555.00	\$111.00
04/05/19	Newman, Lauren	Review and analyze motion for leave to appeal, and perform legal research into bankruptcy rules on same	0.50 \$555.00	\$277.50
04/05/19	Farrell, David D.	Analysis of denial of dismissal order is a "final" order for purposes of appeal and opposing Longo's motion for interlocutory appeal	0.20 \$620.00	\$124.00
04/10/19	Farrell, David D.	Research in connection with response in opposition to Longo's motion for interlocutory appeal of denial of dismissal motion (1.1); review underlying bankruptcy court pleadings (.4)	1.50 \$620.00	\$930.00
04/15/19	Farrell, David D.	Draft response in opposition to judgment creditor J. Longo's motion for leave to pursue interlocutory appeal of denial of dismissal motion due to lack of jurisdiction	2.50 \$620.00	\$1,550.00
04/16/19	Newman, Lauren	Arrange for filings in District Court to respond to appeal by Longo of denial of dismissal	0.20 \$555.00	\$111.00
04/16/19	Newman, Lauren	Communication to A. Moglia, trustee, to advise J. Longo filed a motion for a stay pending appeal	0.20 \$555.00	\$111.00
04/16/19	Newman, Lauren	Communication to A. Moglia, trustee, with copy of response and opposition to Longo's motion for leave to appeal order denying motion to dismiss	0.20 \$555.00	\$111.00
04/16/19	Newman, Lauren	Communication to J. Gallo, Moglia Advisors, re strategy on pending appeal	0.20 \$555.00	\$111.00
04/16/19	Newman, Lauren	Draft appearance for District Court appeal by judgment creditor J. Longo	0.30 \$555.00	\$166.50
04/16/19	Newman, Lauren	Review and revise response and opposition to Longo's motion for leave to appeal order denying motion to dismiss	1.80 \$555.00	\$999.00
04/16/19	Newman, Lauren	Review notice of motion for a stay pending appeal	0.20 \$555.00	\$111.00

Date	Attorney/ Paralegal	Description	Hours	Amount
04/16/19	Farrell, David D.	Plan strategy re issues relating to response in opposition to J. Longo's motion for leave to file interlocutory appeal and J. Longo's motion for stay pending appeal	0.30 \$620.00	\$186.00
04/23/19	Newman, Lauren	Legal research cases cited by J. Longo in motion for a stay pending appeal	0.50 \$555.00	\$277.50
04/26/19	Newman, Lauren	Draft response and objection to J. Longo's motion for a stay pending appeal	6.50 \$555.00	\$3,607.50
04/29/19	Newman, Lauren	Communication to A. Moglia, trustee, to send copy of court filed trustee' response to judgment creditor's motion for a stay pending appeal	0.20 \$555.00	\$111.00
04/29/19	Newman, Lauren	Continue to draft and revise response and objection to judgment creditor's motion for a stay pending appeal	2.50 \$555.00	\$1,387.50
04/29/19	Newman, Lauren	Finalize response and objection to judgment creditor's motion for a stay pending appeal and arrange for filing with the court	0.20 \$555.00	\$111.00
		Total Charges	54.10	\$30,015.50

) Improper location

## **EXHIBIT F**

EXPENSES

Date	Description	Amount
10/03/18	For title search for property located at 525 E. 130th Street, Chicago, IL 60628; VENDOR: Chicago Title Company, LLC; INVOICE#: 18010547S-1	\$75.00
10/03/18	For UCC and tax lien judgment search for Illinois regarding Rosebud Farm, Inc.; VENDOR: Cogency Global / National Corporate Research; INVOICE#: B098595-02	\$492.50
12/07/18	For service of subpoena on Providence Bank & Trust; VENDOR: ATG LegalServe, Inc.; INVOICE#: 96884; DATE:	\$69.00
Total Charges		\$636.50